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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CHRISTOPHER DOYON,  
  
Defendant.

) Case No.: CR 11-00683 BLF  
) CR 12-00426 BLF

) **STIPULATION TO CONTINUE CHANGE OF**  
) **PLEA HEARING AND EXCLUDING TIME**  
) **UNDER THE SPEEDY TRIAL ACT;**  
) **[PROPOSED] ORDER**

The undersigned parties respectfully request that the change of plea hearing scheduled for November 9, 2021 be continued to January 11, 2022 at 9:00 a.m. The reason for the continuance is to afford the parties additional time to complete a Rule 20 transfer of the defendant's case from the Middle District of Florida to the Northern District of California. In addition, the government will be providing additional discovery to defense counsel later this week concerning the loss amount incurred by the victim, which will inform the defense's evaluation of a proposed plea agreement.

The parties also stipulate and agree to an exclusion of time from November 9, 2021 to January 11, 2022 for to allow for the effective preparation of defense counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

1 IT SO STIPULATED.

2 DATED: 11/4/21

Respectfully submitted,

3 STEPHANIE M. HINDS  
4 Acting United States Attorney

5 /s/ Susan Knight  
6 SUSAN KNIGHT  
Assistant United States Attorney

7 /s/ Jay Rorty  
8 JAY RORTY  
9 Counsel for Mr. Doyon

10 **[PROPOSED] ORDER**

11 Accordingly, for good cause shown, the Court ORDERS that the change of plea hearing  
12 currently scheduled for November 9, 2021 is continued to January 11, 2022 at 9:00 a.m.

13 The Court FURTHER ORDERS that time be excluded under the Speedy Trial Act from  
14 November 9, 2021 through January 11, 2022. The Court finds, based on the aforementioned reasons,  
15 that the ends of justice served by granting the requested continuance outweigh the best interest of the  
16 public and the defendant in a speedy trial. The failure to grant the requested continuance would deny  
17 defense counsel reasonable time necessary for effective preparation, taking into account the exercise of  
18 due diligence, and would result in a miscarriage of justice. The Court therefore concludes that this  
19 exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

20 IT IS SO ORDERED.

21 DATED:

22 HONORABLE BETH LABSON FREEMAN  
23 United States District Judge